

1 MANITA RAWAT  
2 Nevada Bar No.: 9656  
DUANE MORRIS LLP  
100 North City Parkway, Suite 1560  
3 Las Vegas, NV 89106-4617  
Telephone No.: (702) 868-2600

4 Attorney for Defendant

5

6

7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 2-Way Computing, Inc.,

11 Plaintiff,

12 v.

13 Cisco Systems, Inc.,

14 Defendant.

15 Case No. 2:15-cv-02235-RFB-NJK

16 **STIPULATION AND ORDER  
FOR EXTENSION OF TIME TO  
ANSWER OR OTHERWISE  
RESPOND TO THE  
COMPLAINT**

17 **(SECOND REQUEST)**

18 Plaintiff 2-Way Computing, Inc. (“2-Way Computing”) and Defendant Cisco  
19 Systems, Inc. (“Cisco”), by and through their counsel, hereby stipulate and agree to this  
second request for an extension of time for Cisco to file its Answer or otherwise respond  
20 to 2-Way’s Complaint for Patent Infringement (“Complaint”).<sup>1</sup>

21 The Complaint was served on December 18, 2016 and Cisco’s Answer was  
22 originally due on January 7, 2016. Pursuant to Local Rule 6-1(b), the parties state that  
23 good cause exists to extend the original deadline from January 7, 2016 to February 8,  
24 2016 to provide Cisco with ample time to investigate the allegations in the Complaint in  
light of the intervening holidays and Cisco’s company-wide shut down from December

25  
26  
27 <sup>1</sup> On December 23, 2015, the parties filed a Stipulation and Order for Extension of Time to  
Answer or Otherwise Respond to the Complaint (First Request). (Dkt. No. 7). This Stipulation  
28 was denied without prejudice for failure to state the reasons for the requested extension. (Dkt.  
No. 16).

1 24, 2015 through January 4, 2016.

2 The parties therefore stipulate and agree to extend the deadline for Cisco to file its  
3 Answer or otherwise respond to the Complaint to February 8, 2016. This Stipulation is  
4 made for good cause and not for purposes of delay. Furthermore, this Stipulation shall not  
5 be construed as a waiver of any rights belonging to any of the parties hereto.

6 Dated this 12<sup>th</sup> day of January, 2016.

7 DUANE MORRIS LLP

8  
9  
10 By: /s/ Manita Rawat  
11 MANITA RAWAT  
12 Nevada Bar No.: 9656  
13 100 North City Parkway, Suite 1560  
14 Las Vegas, NV 89106-4617  
Telephone No.: (702) 868-2600  
Facsimile: (702) 385-6862

15 Matthew S. Yungwirth  
16 (*Pro Hac Vice* to be submitted)  
Christopher J. Tyson  
17 (*Pro Hac Vice* to be submitted)  
Jennifer H. Forte  
18 (*Pro Hac Vice* to be submitted)  
1075 Peachtree Street  
Suite 2000  
19 Atlanta, Georgia 30309

20 Attorneys for Defendant

21 Dated this 12<sup>th</sup> day of January, 2016.

22 BORGHESE LEGAL, LTD.

23 By: /s/ Mark R. Borghese  
Mark R. Borghese  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone No.: (702) 382-0200  
Facsimile No.: (702) 382-0212

24 RUSS, AUGUST & KABAT  
Reza Mirzaie (*Pro Hac Vice*)  
Paul S. Kroeger (*Pro Hac Vice*)  
Stanley H. Thompson, Jr.  
(*Pro Hac Vice*)  
C. Jay Chung (*Pro Hac Vice*)  
12424 Wilshire Boulevard  
12<sup>th</sup> Floor  
Los Angeles, California 90025

25 Attorneys for Plaintiff

26 **ORDER**

27 IT IS SO ORDERED that Cisco shall be allowed to file its Answer or otherwise  
28 respond to the Complaint on or before February 8, 2016.

DATED: This 13<sup>th</sup> day of January, 2016

Judge Nancy J. Koppe

1                   **PROOF OF SERVICE**

2                   I hereby certify that I am a citizen of the United States and am employed in Fulton  
3 County, where this mailing occurs. I am over the age of eighteen years and not a party to  
4 the within entitled action; my business address is 1075 Peachtree Street, Suite 2000,  
Atlanta, Georgia 30309.

5                   On January 12, 2016, I served the document described as **STIPULATION AND**  
6 **ORDER FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND**  
7 **TO THE COMPLAINT** on the interested party(ies) in this action as follows:

8                   Mark R. Borghese  
9                   [mark@borgheselegal.com](mailto:mark@borgheselegal.com)  
BORGHESE LEGAL, LTD.  
10 10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145

Reza Mirzaie  
[rmirzaie@raklaw.com](mailto:rmirzaie@raklaw.com)  
Paul S. Kroeger  
Stanley H. Thompson, Jr.  
C. Jay Chung  
RUSS, AUGUST & KABAT  
12424 Wilshire Boulevard, 12<sup>th</sup> Floor  
Los Angeles, California 90025

15                   **BY ELECTRONIC SERVICE:** I served a true copy, with all exhibits,  
16 electronically on designated recipients via electronic transmission of said document(s) as  
17 provided under Federal Rules of Civil Procedure.

18                   **BY MAIL:** I am “readily familiar” with the firm’s practice of collection and  
19 processing correspondence for mailing. Under that practice it would be deposited with the  
20 U.S. postal service on that same day with postage thereon fully prepaid at Las Vegas,  
21 Nevada, in the ordinary course of business.

23                  */s/ Carolyn A. Parker*

24                  Carolyn A. Parker  
An employee of DUANE MORRIS LLP